## FORD SEA PRODUCTS, INC.

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8176 '99 APR 19 P2:00

**April 5, 1999** 

Dockets Management Branch (HFA-305) FDA 5630 Fishers Lane Rockville, MD., 20852

Dear FDA:

I am writing this to express my strong opposition to the rules the Center for Science in the Public Interest (CSPI) are asking your Office to consider relative to "post-harvest treatment" (PHT) of shellfish prior to marketing.

I base my protest on the economic damage which I believe would be incurred by so many, should these proposed rules be imposed on our industry. (i.e.- sharp market decline caused by the disregarding of the consumer's preference for the freshest seafood available; the high cost for PHT products; production "slow-downs" resulting in job/income reductions for harvesters, dealers, processors, haulers, and distributors, et al; shuckers (openers), most of which are Asians at our facility, would suffer economically; etc.)

The factors mentioned above, compounded by high equipment cost which would be required in a PHT operation, would probably cause the closures of many small businesses altogether. Limited profits, current operating costs, adverse weather conditions, etc., are faced continually by most shellfish dealers, and do not need these costly and unnecessary rules which you have been asked to consider by the CSPI.

In lieu of imposing these CSPI rules upon our business, I urge the FDA to reject them, and allow existent state and national bodies to continue their oversight and educational activities, especially educating consumers as to their level of personal responsibility to heed the ample warnings regarding the consumption of shellfish, especially in a raw or under-cooked state.

With gratitude for the service of your Office, I remain,

Sincerely,

Kenneth B. Ford Jr./Owner/Pres

98P-0504

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